

70506-35

11/06/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV - 6 2007

Rebecca A. Clemmer
United Phosphorous, Inc.
423 Riverview Plaza
Trenton, NJ 08611

Dear Ms. Clemmer:

Subject: Label Amendment
Devrinol Technical Selective Herbicide
EPA Reg. No. 70506-35
Submission dated September 14, 2007

The labeling, referred to above, submitted in connection with the application under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the following changes:

3. Add a section on Personal Protective Equipment (PPE) with the following requirements:

Handlers must wear:

- Long-sleeved shirt and pants.
- Chemical resistant gloves made of waterproof materials.
- Shoes plus socks.

4. It is recommended that you add the following User Safety Recommendations:

Users should:

- Wash hands before eating , drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on cleaning clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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The amended label supersedes all previously accepted labels. A stamped copy of the revised label is enclosed for your records. Please submit one copy of your final printed label before you release the product for shipment.

Sincerely yours,

Jim Tompkins
Product manager (25)
Herbicide Branch
Registration Division (7505P)

Enclosure

CURRENCES								
SYMBOL >	7505P	7505P						
SURNAME >	C. Bien	Tompkins <i>JK</i>						
DATE >	10-29-07	11-5-07						

Devrinol[®] Technical Selective Herbicide

For Manufacturing Use Only

Active Ingredients:	
Napropamide*	95.7%
Other Ingredients:	4.3%
Total:	100.0%

* CAS No. 15299-99-7

KEEP OUT OF REACH OF CHILDREN.

CAUTION

HARMFUL IF SWALLOWED

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER	
For emergency medical assistance, contact the Rocky Mountain Poison Control Center at 1-866-767-5089.	
For chemical emergency: spill, leak, fire, exposure, or accident, call CHEMTREC 1-800-424-9300.	

EPA Reg. No. 70506-35

EPA Est.

Country of Origin:

NET WEIGHT:

Manufactured for:
United Phosphorus, Inc.
630 Freedom Business Center
King of Prussia, PA 19406 • www.upi-usa.com

ACCEPTED
with COMMENTS
in EPA Letter Dated

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

70506-35

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed. Harmful if absorbed through the skin. Avoid contact with skin, eyes and clothing. Wear protective eyewear, chemical resistant gloves, and appropriate clothing when handling. Wash thoroughly with soap and water after use.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

Spill or Leak

Sweep up spilled material. Place in an appropriate waste container. Flush spill area with water. Observe all local, state and federal laws and regulations regarding disposal, spill, cleanup removal or discharge.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product.

Only for formulation into a herbicide for the following uses:

1. **Terrestrial - Food:** Almonds, Asparagus, Basil, Blueberries, Broccoli, Brussels Sprouts, Cabbage, Caneberries (blackberries, raspberries, boysenberries, loganberries), Cauliflower, Cranberries, Eggplant, Filberts, Grapes, Kiwifruit, , Marjoram, Mint, Pecans, Peppers, Persimmons, Rhubarb, Rosemary, Summer Savory, Winter Savory, Strawberries, Tobacco, Tomatoes.

Terrestrial - Nonfood/Noncrop/Domestic Outdoor: Ornaments (Field & Container Grown, Home Grounds, Highways, Industrial); Turfgrass.

2. Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
3. Uses for experimental purposes that are in compliance with USEPA requirements.

<p>For non-emergency (e.g. current product information) call United Phosphorus, Inc. at 1-800-438-6071.</p>

STORAGE AND DISPOSAL

Prohibitions

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum cannot be reused, dispose of in the same manner.

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

United Phosphorus, Inc. warrants that at the time of delivery, this product will conform to its chemical description on the label, that it is reasonably fit for the purposes referred to in the Directions for use, that it will pass without objection in the trade under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

To the extent allowed by applicable law, UNITED PHOSPHORUS, INC. MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. BUYER ACKNOWLEDGES THE USE OF ITS OWN INDEPENDENT SKILL AND EXPERTISE IN THE SELECTION AND USE OF THE PRODUCT AND DOES NOT RELY ON ANY ORAL OR WRITTEN STATEMENTS OR REPRESENTATIONS.